

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 18-CR-143

WAHEBA ISSA DAIS,

Defendant.

MOTION TO ADJOURN SENTENCING

Waheba Dais, through counsel, moves to adjourn the sentencing hearing in this case, which the Court scheduled for September 12, 2019. Dais makes this motion in order that she and her counsel have additional time to prepare for this hearing as she elaborates below.

1. Dais faces a maximum sentence of 20 years' prison based upon her plea to the charge in count one of the indictment, attempting to provide material support to a foreign terrorist organization, contrary to 18 U.S.C. § 2339B(a)(1). In the plea agreement, the government has promised to "recommend a sentence within the applicable sentencing guideline range, as determined by the court." The government believes that guideline range will exceed the statutory maximum sentence.

2. Though Dais has been detained for over a year, compared to similar cases, she resolved hers rather quickly. This case's relatively short duration is seen in its status at the time the parties filed the plea agreement: Dais' case was still referred to the

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magistrate judge who, after the filing of the plea agreement, then cancelled a hearing at which the parties were prepared to ask for a schedule for the filing of motions. *See* Pacer entries on March 28, 2019.

3. Dais' counsel has consulted and hired an expert to assist Dais in presenting relevant sentencing information to this Court. The expert informed counsel that the expert cannot complete the work before the date of the scheduled sentencing hearing. Counsel deems this work abundantly necessary and only fair that it take place. This is especially so in light of the enormous resources that the government has directed at this case, which is perhaps their obligation and certainly their prerogative.

Undersigned counsel spoke earlier this week with Assistant United States Attorney Rebecca Taibleson who stated that the government takes no position on this request.

Accordingly, Waheba Dais asks this Court to adjourn the September 12, 2019 sentencing hearing to a time amenable to the Court.

Dated at Milwaukee, Wisconsin, this 9th day of August, 2019.

Respectfully submitted,

/s/ John W. Champion

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